

STATE OF RHODE ISLAND  
PUBLIC UTILITIES COMMISSION

In Re:

City of Newport Utilities Department,  
Water Division  
Notice of Proposed Changes in Rates

Docket No. 3457

**MOTION TO INTERVENE OF PORTSMOUTH WATER AND FIRE DISTRICT**

The Portsmouth Water and Fire District ("Portsmouth") hereby moves to intervene in this proceeding. In support of this motion, Portsmouth states that:

1. Portsmouth purchases all of the water that it supplies to customers within the Portsmouth Water and Fire District.
2. The City of Newport Utilities Department, Water Division ("Newport"), is the sole supplier of water to Portsmouth.
3. Portsmouth estimates that it will purchase approximately 450,000,000 gallons of water from Newport during its current fiscal year, which runs from May 1, 2002, to April 30, 2003.
4. Portsmouth purchased an average of 358,706,000 gallons of water from Newport during each of its previous five (5) fiscal years.

Portsmouth seeks to intervene in this proceeding pursuant to the Rhode Island Public Utility Commission's Rules of Practice and Procedure. Portsmouth possesses an interest that may be directly affected by the Commission's action in the proceeding and is not adequately represented by the existing parties. Portsmouth's participation in this proceeding is also clearly in the public interest.

Respectfully submitted,

PORTSMOUTH WATER AND FIRE DISTRICT

By its attorneys,

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DATED: October 16, 2002

## **CERTIFICATION**

### **TO:**

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I hereby certify that I mailed a true and accurate copy of the within Motion to Intervene to counsel of record, as set forth above, on September \_\_\_\_\_, 2002.

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